

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-CR-076 (KMM/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	GOVERNMENT’S
)	MOTION TO
)	DESIGNATE CASE AS
(1) SHEVIRIO KAVIRION CHILDS-YOUNG,)	COMPLEX UNDER THE
a/k/a “Rio,” and)	SPEEDY TRIAL ACT
)	
(2) WILLIAM CHARLES SAFFOLD,)	
)	
Defendants.)	

The United States of America, by its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Thomas Calhoun-Lopez, Assistant United States Attorney, respectfully moves this Court an order designating the above-captioned matter as a complex case for purposes of the Speedy Trial Act, continuing the current deadlines for disclosure, and for filing and hearing motions and trial pursuant to 18 U.S.C. § 3161(h)(7)(A). The grounds for this motion are as follows:

1. The Defendants are charged by an indictment filed on April 26, 2022, with a series of armed carjackings and robberies. (Document No. 1.) Childs-Young is charged with conspiracy to use, carry, and brandish firearms during and in relation to a crime of violence (Count 1); four counts of aiding and abetting carjacking (Counts 4, 7, 10, 13); five counts of aiding and abetting interference with commerce by robbery (Counts 5, 8, 11, 14, 19); and five counts

of brandishing a firearm during and in relation to a crime of violence (Counts 6, 9, 12, 15, 20). Saffold is charged with conspiracy to use, carry, and brandish firearms during and in relation to a crime of violence (Count 1); two counts of aiding and abetting carjacking (Counts 2, 16); two counts of aiding and abetting interference with commerce by robbery (Counts 17, 19); and three counts of brandishing a firearm during and in relation to a crime of violence (Counts 3, 18, 20).

2. The indictment involves seven separate offense incidents, as well as multiple investigative events (searches, interviews, etc.) and dozens of uncharged but related offenses incidents. Discovery is very large and complicated. It includes thousands of written reports, as well as voluminous videos, photographs, and content obtained through search warrants.

3. Arraignment orders have been issued by the Court. (Document No. 26, 27.) The United States is to currently ordered to provide disclosures on June 23, 2022; the Defendants are ordered to make disclosures by June 30, 2022; motions are due by July 7, 2022; responses are due by July 21, 2022, and a motions hearing has been set for July 28, 2022. (*Id.*)

4. Given the size, complexity, and scope of the investigative materials relative to the overall investigation, the United States requests that this case be designated complex. The United States will need additional time to provide fulsome and intelligent access to certain of these materials to the

Defendants. Furthermore, under the current scheduling order, the Defendants would have a limited opportunity to conduct a meaningful review for the purpose of filing motions and preparing for trial. The parties would be unable to intelligently accomplish the goals of Local Rule 12.1, especially the directives to “confer with the responding party” and to “attempt in good faith to clarify and narrow the issues in dispute” before submitting any pretrial motions.

5. Accordingly, the United States believes a continuance is warranted under 18 U.S.C. § 3161(h)(7)(B)(ii).

6. The case is unusual and complex in that the indicted conduct involves a large-scale conspiracy with multiple separate incidents. The evidence includes thousands of pages of written and documentary materials, as well as voluminous videos, photographs, and content obtained through search warrants.

7. Furthermore, based on the Government’s assessment of recently obtained evidence, the existing indictment may be superseded.

8. The United states has conferred with counsel for Childs-Young and with counsel for Saffold. Neither defendant objects to the Government’s motion or the continuance contemplated herein.

WHEREFORE, the Government respectfully requests that the Court designate this matter as complex, and extend all due dates in the current

scheduling order, to include the time set for the disclosure of Rule 16 materials as well as the filing of motions and responses, by at least 45 days.

Dated: June 21, 2022

Respectfully Submitted,

ANDREW M. LUGER
United States Attorney

s/ Thomas Calhoun-Lopez
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Assistant U.S. Attorney
Attorney ID No. 480908DC